Gifts and invitations Policy

Preamble

Corruption poses a number of risks (judicial sanctions, reputational, financial risks...) which seriously jeopardize the activities of a company and expose its employees to strong convictions.

The Precia SA group has adopted the Middlenext anti-corruption code of conduct which refers to the United Nations Convention against corruption and is committed to combating all forms of corruption.

This note is intended to inform you of the sensitivity of gifts and hospitality received or offered in the course of your professional activities. It complements the code of conduct in order to give you concrete elements to allow you to make the decisions adapted according to the context.

In fact, according to the uses of countries, cultures, codes of courtesy vary, there is no single situation.

The rule that prevails is to respect the law and regulations in force and the rules of this policy. In particular situations not specifically described it is up to everyone to make the best decision by appealing to his common sense, to his experience. In any case, we should not hesitate to consult his hierarchy, knowing that any decision can engage the responsibility of the collaborator and impact the company.

1 General principles of gifts and hospitality

Are gathered under the term gifts: any thing of value, any advantage: service, invitation, discounts offered or received, directly or indirectly

Are gathered under the expression of hospitality: meals, travel, accommodation, cultural or sporting event, reception offered or received, directly or indirectly

Gifts and hospitality marks given or received must meet certain conditions:

- Comply with applicable law and regulations
- No obligation, consideration or unfair advantage,
- Do not generate a conflict of interest,
- Be reasonable, of a limited amount, corresponding to current practices
- Staying in the professional field
- Staying casual
- Not to be of a monetary or equivalent nature (vouchers...)
- Be made transparently

2 Rules for gifts and hospitality received and donated

Each employee must analyse the circumstances in order to determine what is reasonable in accordance with the practices authorized by the company.

If the gifts received are modest or if they are advertising items they can be kept as an individual.

In principle, important gifts will have to be returned in the name of compliance with the company code of conduct. However if this gesture may be misunderstood and after agreement of the hierarchy the gift can be accepted in order to be shared within the company.

In terms of hospitality brands, it is possible to accept and offer:

- business meals, the amount of which is measured (reference to the fee policy), i.e . in line with what you are allowed to offer in return
- invitations to an event, provided that it is in the professional context and limited to the event only
- hospitality marks provided that they are addressed only to professional contact and not to family members or friends;

The contract signing tender periods require vigilance, the conditions must be checked in advance to verify that there is no direct connection with the signature of a contract, or, that if it exists, this cannot be assimilated to a corruption, especially if it concerns public officials.

To facilitate decision-making, the Precia group has defined approval rules and procedures, where only reasonable gifts (or hospitality) can be accepted.

Gifts (or hospitality) are said to be reasonable as long as you are able to offer in return a gift (or hospitality brand) equivalent in accordance with the applicable fee policy.

In the event that the proposed gifts (or hospitality) are not reasonable, the employee must inform his/her hierarchy before making any decisions.

We also invite you to keep all the parts allowing you to justify the conformity of the gift or the hospitality brand, in order to be able to present them on request of your hierarchy and register them in the accounts

3 Scope of application

This policy applies:

- To any collaborator of the Group and its subsidiaries and extends to the members of the family and to the relatives of the collaborator
- To any person acting on behalf of the Precia SA group or its subsidiaries, (consultant, intermediary, advised...)
- Whether the recipient or donor of the gift or hospitality brand is a public or private, national or international agent

In order to comply with the regulations applicable to each company of the PRECIA SA group, a specific procedure may be set up for a given country. This specific procedure can be defined by different means: internal note, procedure, internal regulations, contract of employment etc.... Thus, a company of the Group may set thresholds beyond which gifts and invitations received or offered are forbidden, provide for a procedure of special registration or prior validation of gifts and invitations etc ...

This specific procedure may set stricter rules than the present group procedure, but in no case may be less stringent.

4 Recording and control

Once a gift and/or a brand of hospitality have been subject to prior authorisation, they are registered as such.

It is the responsibility of each manager to ensure the implementation of this policy within its teams. Regular audits will be conducted on this implementation.

5 Sanctions

In any event, it is the responsibility of each person to refuse a gift or a mark of a special nature that would not respect the principles of this policy.

Being influenced or sought to influence someone by gifts or hospitality is punishable by disciplinary or even penal penalties.

In case of doubt: seek advice from the hierarchy, the ethics and compliance referent or the human resources.

On June 1st 2019

Rene Colombel

Chairman of the Management Board